

The Honorable Robert S. Lasnik

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

SUSAN SOTO PALMER, et al.,

Plaintiffs,

v.

STEVEN HOBBS, in his official capacity
as Secretary of State of Washington, and
the STATE OF WASHINGTON,

Defendants,

and

JOSE TREVINO, et al.,

Intervenor-Defendants.

NO. 3:22-cv-5035-RSL

STATE OF WASHINGTON’S
RESPONSE TO PLAINTIFFS’
REMEDIAL PROPOSALS

Pursuant to this Court’s October 4, 2023 Order (Dkt. # 230), the State of Washington submits the following response to the proposed remedial maps submitted by Plaintiffs.

The State does not dispute Plaintiffs’ assertion that each map “is a complete and comprehensive remedy to Plaintiffs’ Section 2 harms” Dkt. # 245 at p. 2. The State defers to the Court on which remedial map best provides Latino voters with an equal opportunity to elect candidates of their choice while also balancing traditional redistricting criteria and federal law.

1 Additionally, as the Court is well aware, one key consideration in creating LD 15 was
2 respecting the sovereign interests of the Yakama Nation. These interests should likewise be
3 respected in any court-ordered remedial map. To the extent the Yakama Nation wishes to be
4 heard on the matter, the State defers to them to express their own sovereign interests.

5 DATED this 22nd day of December 2023.

6
7 ROBERT W. FERGUSON
8 Attorney General

9 /s/ Andrew R.W. Hughes
10 ANDREW R.W. HUGHES, WSBA #49515
11 Assistant Attorney General
12 800 Fifth Avenue, Suite 2000
13 Seattle, WA 98104
14 (206) 464-7744
15 andrew.hughes@atg.wa.gov

16 CRISTINA SEPE, WSBA #53609
17 Deputy Solicitor General
18 1125 Washington Street SE
19 PO Box 40100
20 Olympia, WA 98504-0100
21 (360) 753-6200
22 cristina.sepe@atg.wa.gov

23 *Attorneys for Defendant State of Washington*

24 I certify that this memorandum contains 149 words,
25 in compliance with the Local Civil Rules.
26

DECLARATION OF SERVICE

I hereby declare that on this day I caused the foregoing document to be electronically filed with the Clerk of the Court using the Court's CM/ECF System which will serve a copy of this document upon all counsel of record.

DATED this 22nd day of December 2023, at Seattle, Washington.

/s/ Andrew R.W. Hughes

ANDREW R.W. HUGHES, WSBA #49515
Assistant Attorney General